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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

AUGUSTINE CALLEROS, JR.,

Plaintiff,

vs.

CITY OF NORTH LAS VEGAS, a municipal  
corporation,

Defendant.

CASE NO.: 2:23-cv-01340-GMN-DJA

**STIPULATION TO EXTEND DEADLINE  
TO RESPOND TO DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT  
[ECF No. 44]**

(Third Request)

Plaintiff, Augustine Calleros, Jr. ("Calleros"), by and through his counsel, Melanie Hill Law, and Defendant City of North Las Vegas ("CNLV"), by and through its counsel, Madison Zornes-Vela, hereby stipulate to extend the deadline for Mr. Calleros to respond to Defendant's Motion for Summary Judgment filed on August 28, 2024 [ECF No. 44] from the current deadline of November 18, 2024 for three additional days up to and including November 21, 2024. This Stipulation is made at the request of Plaintiff's counsel for the reasons set forth herein. This is the third request to extend the deadline to respond to this dispositive motion.

In support of this Stipulation and Order, the parties state as follows:

1. The current deadline to respond to the Defendant's Motion for Summary Judgment filed on August 28, 2024 [ECF No. 44] is November 18, 2024. The parties have agreed to a third

1 extension of the deadline three additional days from the current deadline of November 18, 2024 until  
2 November 21, 2024.

3 2. Counsel for Plaintiff reached out to counsel for Defendant requesting an additional three-  
4 day extension of the response deadline due to Plaintiff's counsel's daughter's illness last week that kept  
5 her out of school and continued over the weekend and Plaintiff's counsel's illness that started this  
6 morning. Counsel for Defendant has agreed to the requested three-day extension.

7 3. This stipulation to extend the dispositive motion deadlines is brought in good faith, with a  
8 showing of good cause, and is not sought for any improper purpose or other purpose of delay, but to  
9 allow counsel for the Plaintiff the additional time requested to respond to the dispositive motion  
10 considering the issues she has described herein constituting good cause for the short extension.

11 WHEREFORE, the parties respectfully request by this stipulation that the Court extend the  
12 deadlines for Mr. Calleros to respond to the City of North Las Vegas's Motion for Summary Judgment  
13 filed on August 28, 2024 [ECF No. 44] from the current deadlines of October 18, 2024 to November  
14 18, 2024.

15 DATED this 18th day of November, 2024.

16 Respectfully submitted,

17 MELANIE HILL LAW PLLC

18 /s/ Melanie Hill

19 Melanie A. Hill, Esq. (NV Bar No. 8796)  
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23 *Attorney for Plaintiff Augustine Calleros, Jr.*

Respectfully submitted,

NORTH LAS VEGAS CITY ATTORNEY

/s/ Madison Zornes-Vela

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Tel: (702) 633-1057  
*Attorney for Defendant City of North Las Vegas*

24 IT IS SO ORDERED:

25  
26   
27 GLORIA M. NAVARRO  
28 UNITED STATES DISTRICT JUDGE

Dated: November 19, 2024